

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*, Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*, Case No. 1:18-op-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DEFENDANTS' NOTICE OF FILING REDACTED DEPOSITION TRANSCRIPTS
CITED IN MOTIONS FOR SUMMARY JUDGMENT AND *DAUBERT* MOTIONS
PURSUANT TO ORDER AMENDING PROCEDURES REGARDING REDACTIONS
AND FILING OF BRIEFS UNDER SEAL [DOCKET NO. 1813]**

Pursuant to the Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal, dated July 5, 2019 [Dckt 1813], Defendants provide this notice of filing the attached deposition transcripts with proposed redactions, which are exhibits to the parties' motions for summary judgment and *Daubert* motions.

Dated: July 25, 2019

Respectfully submitted,

/s/ Mark S. Cheffo

Mark S. Cheffo
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Tel: (212) 698-3500
Mark.Cheffo@dechert.com

*Counsel for Defendants Purdue Pharma L.P.,
Purdue Pharma Inc., and The Purdue Frederick
Company*

*Co-Liaison Counsel for the Manufacturer
Defendants*

/s/ Carole S. Rendon

Carole S. Rendon
BAKER & HOSTETLER LLP
Key Tower 127 Public Square, Suite 2000
Cleveland, OH 44114-1214
Telephone: (216) 621- 0200
Fax: (216) 696-0740
crendon@bakerlaw.com

*Counsel for Defendants Endo Health Solutions Inc.
and Endo Pharmaceuticals Inc.; Par
Pharmaceutical, Inc., and Par Pharmaceutical
Companies, Inc.*

*Co-Liaison Counsel for the Manufacturer
Defendants*

/s/ Enu Mainigi

WILLIAMS & CONNOLLY LLP
Enu Mainigi
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
Fax: (202) 434-5029
emainigi@wc.com

Counsel for Defendant Cardinal Health, Inc.

Co-Liaison Counsel for the Distributor Defendants

/s/ Shannon E. McClure

Shannon E. McClure
REED SMITH LLP
Three Logan Square
1717 Arch Street, Suite 3100
Philadelphia, PA 19103
Telephone: (215) 851-8100
Fax: (215) 851-1420
smcclure@reedsmith.com

*Counsel for Defendant AmerisourceBergen Drug
Corporation*

Co-Liaison Counsel for the Distributor Defendants

/s/ Geoffrey Hobart

Geoffrey Hobart
COVINGTON & BURLING LLP
One CityCenter, 850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-5281
ghobart@cov.com

Counsel for Defendant McKesson Corporation

Co-Liaison Counsel for the Distributor Defendants

/s/ Kaspar Stoffelmayr

Kaspar Stoffelmayr

BARTLIT BECK LLP

54 West Hubbard Street

Chicago, IL 60654

Telephone: (312) 494-4400

Fax: (312) 494-4440

kaspar.stoffelmayr@bartlitbeck.com

Counsel for the Walgreens Defendants

*Liaison Counsel for the Chain Pharmacy
Defendants*

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing document was served via the

Court's ECF system to all counsel of record on July 25, 2019.

/s/ Geoffrey Hobart

Geoffrey E. Hobart

Mark Lynch

COVINGTON & BURLING LLP

One CityCenter

850 Tenth Street NW

Washington, DC 20001

Tel: (202) 662-5281

ghobart@cov.com

mlynch@cov.com

Counsel for McKesson Corporation

*Co-Liaison Counsel for the
Distributor Defendants*